To: MLPAI North Coast Regional Stakeholder Group

From: Tom Shaver, Foodshed Array Creator

Re: External Array A

March 24, 2010

External Array A was created to address several concerns about the MLPAI process in the North Coast study region:

That placement of an MPA near a port could have a devastating effect on the ability of local people to obtain sustainably harvested food from the ocean.

That if the overly precautionary size and spacing pattern of MPAs in previously established study regions were imposed on the North Coast, that this would cause severe socioeconomic harm and be an impediment to more attractive modes of marine management.

That the MLPA master plan size and spacing guidelines and level of protection ratings may be based on dubious science and inaccurate assumptions.

That management in general and adaptive management in particular are not to be considered in the MLPAI process.

That fundamental socioeconomic and ecological differences between the North Coast and other study regions would not adequately be taken into account.

That tribal peoples could be denied their rights to use the ocean for ceremonial and subsistence purposes.

Therefore, external Array A proposes an alternative to the approach taken by the MLPA Initiative in other study regions. The idea for Mobile MPAs came from talking with fishermen. Every fisherman who I have had the opportunity to dialog with about mobile MPAs likes the concept. There is scientific support for rotational MPAs and they have a track record of success in a variety of locations and fisheries. Mobile MPAs are presented in Array A for the primary purpose of offering fishermen and local community members at each port an alternative to advocate for should they be threatened with the location of a permanent MPA within 10 miles of their port mouth.

Because the mobile MPAs in Array A are presented as an alternative to permanent MPAs and are depicted in their specific locations in MarineMap for discussion and comparison purposes only, they should **not** be depicted on the map showing overlap among external arrays. I do not approve of their use to support the location of permanent MPAs near port zones. I have requested that the staff remove mobile MPAs from the overlap map.

Another purpose of including mobile MPAs in Array A is to more strongly advocate for locally designed adaptive management. Providing a concrete example of a potential adaptive management technique with strong parallels to the MLPA Master Plan Guidelines allows for a greater degree of comparison to static management than would be possible were adaptive management proposed merely as an abstract concept.

Adaptive management has a greater chance of leading to the fundamental social changes that we must make to live sustainably. Tribal peoples have a long history of land and marine management practices in which human benefit and ecological abundance go hand in hand. 2009 Nobel Economics Laureate Eleanor Ostrom has compiled a large body of knowledge to draw from about successful management of the commons. We have an opportunity in the abundantly productive North Coast ecosystem with a small population base to create a model system of marine stewardship that maximizes both socioeconomic benefit and ecosystem vitality.

Array A demonstrates how low economic impact and high conservation value can be achieved together with a fewer/larger pattern of MPAs and locally designed adaptive management in between. The SAT evaluations show Array A to have the lowest net economic impact according to Ecotrust data while rating highest in conservation value in some bioeconomic modeling categories.

The reason the habitat assessments and size and spacing evaluations are low in Array A relative to others is because only those MPAs with a level of protection above moderate high are counted. Many MPAs in Array A include take of edible kelp, sea urchin, abalone and/or a few other species that drop the LOP rating for those MPAs below moderate high. This was done in anticipation of the LOP rating for these uses eventually being raised for the region or adjusted to account for predictable take in a specific reserve. When compared with other arrays at all levels of protection, Array A comes out highest or among the highest in representation of many soft and hard bottom types.

The SAT's assessments of the LOP rating for some species does not adequately take into account the predictable amount of take by the method specified both in the general sense for the entire region and for a particular proposed reserve. The assessments for take of all edible kelp species are inaccurate regarding harvest techniques and predictable amount of take. I am working on a thorough critique of assessed levels of protection for take of edible kelp, red abalone and sea urchin which I will be happy to share with you when I finish it.

The 4 MPAs with the most commonality among the external arrays - Pyramid Point, Reading Rock, Punta Gorda, and Ten Mile – come very close on their own to adequately meeting the goals of the MLPA for the North Coast. I personally feel that those reserves alone, with perhaps the addition of some special closures for specific habitat representation or protection of birds or mammals, would be more than adequate to preserve marine life on the North Coast given current fishery management practices.

Here are some suggestions for actions that the NCRSG could take:

Regarding the creation of an integrated NCRSG array the NCRSG could:

- 1. Begin by concentrating on the 4 MPAs with the most commonality among the external arrays: Pyramid Point, Reading Rock, Punta Gorda, and Ten Mile.
- 2. Next, consider the addition of special closures to fill gaps in habitat representation and bird and mammal protection.
- 3. Establish a guiding principle that the NCRSG will not propose any permanent MPAs of preferred size within 10 miles of a port.
- 4. Refrain from getting distracted by discussion of mobile MPAs until a group advocates for a specific mobile MPA as an alternative to a proposal from another MLPAI body that a permanent MPA be located within 10 miles of a port.
- 5. Develop a clear and persuasive rationale for the North Coast pattern of MPAs to differ from that of other regions.

The NCRSG could request that the SAT:

- 1. Raise the LOP rating for take of all edible kelp by hand harvest to at least Moderate High.
- 2. Take into account the predictable level of take for a proposed allowed use at a particular proposed MPA when assessing its LOP rating.

I am encouraged by the unanimous effort by all arrays to defend sovereign tribal use rights and that port areas were largely avoided for placement of permanent MPAs.

Please let me know how I can assist you in taking the above actions.

Sincerely,

Tom Shaver